



## Metro-North Railroad

March 18, 2024

### **BY ECF**

Honorable Lorna G. Schofield  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Dated: March 20, 2024  
New York, New York

LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE

Re: Elena Kraemer v. Douglas Schroeder et al., 24 Civ. 1015 (LGS) (SLC)

Dear Judge Schofield:

I anticipate representing defendants in the above-referenced action and write with the consent of plaintiff's counsel to request an adjournment of the Initial Conference in this matter, currently scheduled for March 27, 2024 at 4:10 p.m., and the associated March 20, 2024 deadline to file a joint letter and joint Proposed Civil Case Management Plan and Scheduling Order.

Service on the four individuals who have been named as defendants in this action was completed earlier today. I anticipate representing these individuals, who are named as defendants based on their actions on behalf of Metro-North Commuter Railroad, pursuant to the New York Public Authorities Law. However, additional time is required to finalize such representation. Furthermore, upon confirmation of my representation, the parties plan to stipulate to adjourn defendants' deadline to respond to the Complaint until April 30, 2024.

Therefore, to enable me to finalize my representation of defendants and investigate the allegations of the Complaint, the parties respectfully request that the Court reschedule the Initial Conference for a date convenient for the Court after April 30, 2024, and revise the deadline for the parties' joint letter accordingly.

Thank you in advance for your consideration of this request.

Respectfully submitted,

s/ Jennifer A. Mustes

Jennifer A. Mustes  
Associate Counsel,  
Metro-North Railroad  
jmustes@mnrr.org  
(212) 340-2504

cc: Michael H. Sussman, Esq. (counsel for plaintiff, by ECF)